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10 Attorneys for Defendants Briles

11 Aerospace, Inc. and Michael Briles

12 UNITED STATES DISTRICT COURT

13 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

14  
15 SPS TECHNOLOGIES, LLC d/b/a PB  
16 FASTENERS,

17 Plaintiff,

18 vs.

19 BRILES AEROSPACE, INC.,  
20 MICHAEL BRILES, and ROBERT  
21 BRILES,

22 Defendant.

CASE NO. 2:18-cv-09536-MWF-AS

**DISCOVERY MATTER**

**NOTICE OF MOTION AND  
MOTION TO COMPEL  
CONCERNING DISCOVERY  
DISPUTE AS TO WAIVER OF  
PRIVILEGE WITH RESPECT TO  
CERTAIN PLAINTIFF'S  
DOCUMENTS**

**Discovery Cutoff:** TBA

**Pretrial Conference:** TBA

**Trial Date:** TBA

**Hearing Date:** January 16, 2020

**Hearing Time:** 10:00 a.m.

**Before:** Hon. Alka Sagar

**Location:** 255 E. Temple St.,  
Los Angeles, CA, 90012,  
Courtroom 540, 5th Floor

PLEASE TAKE NOTICE, that on January 16, 2020, at 10:00 AM, at the Roybal Federal Building and United States Courthouse, 255 E. Temple St., Los Angeles, CA, 90012, Courtroom 540, 5th Floor, Briles Aerospace, Inc. (“Briles Aerospace”) shall and hereby does move the Court pursuant to Federal Rule of Civil Procedure 37 for resolution of the parties’ current discovery dispute as to waiver of privilege with respect to certain Plaintiff’s documents. Specifically, Briles Aerospace requests that the Court order Plaintiff to immediately produce certain documents identified on SPS’s Second Revised Privilege Log its privilege log specifically identified in the joint stipulation that include Sara Gray—former outside counsel for Precision Castparts Corp. (“PCC”) at Stoel Rives, and current Senior Corporate Counsel at PCC—as an author or addressee, and documents that include Stoel Rives as an author. This motion is based on this notice of motion and motion, the joint stipulation of the parties and exhibits thereto, and such other written or oral argument as may be presented at or before the time this motion is deemed submitted by the Court.

**BRILES AEROSPACE’S CERTIFICATION PURSUANT TO L.R. 37-1**

This motion is made following conference of counsel pursuant to L.R. 37-1, which took place on September 26, 2019.

Dated: December 19, 2019

/s/ *Richard H. Doss*  
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